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*Attorneys for Defendants  
The Walt Disney Company, Lucasfilm Ltd.  
LLC, and Huckleberry Industries (US) Inc.*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

GINA CARANO,

Plaintiff,

v.

THE WALT DISNEY COMPANY,  
LUCASFILM LTD. LLC, and  
HUCKLEBERRY INDUSTRIES (US)  
INC.,

Defendants.

Case No. 2:24-cv-01009-SPG-SK

**DECLARATION OF DANIEL M.  
PETROCELLI IN SUPPORT OF  
DEFENDANTS' MOTION TO  
CERTIFY FOR  
INTERLOCUTORY APPEAL  
UNDER 28 U.S.C. § 1292(b) AND  
STAY OF PROCEEDINGS**

Date: September 25, 2024

Time: 1:30 p.m.

Judge: Hon. Sherilyn Peace Garnett

Courtroom: 5C

**DECLARATION OF DANIEL M. PETROCELLI**

I, Daniel M. Petrocelli, declare and state as follows:

1. I am a member in good standing of the State Bar of California and am admitted to the United States District Court for the Central District of California. I am a partner at the law firm of O'Melveny & Myers LLP, attorneys of record for Defendants The Walt Disney Company, Lucasfilm Ltd. LLC, and Huckleberry Industries (US) Inc. (collectively, "Disney") in this case. I submit this declaration in support of Disney's Motion To Certify for Interlocutory Appeal Under 28 U.S.C. § 1292(b) and Stay of Proceedings (the "Motion").

2. I have personal knowledge of the facts set forth below and, if called to testify as a witness, could and would do so under oath.

3. On Friday, August 16, 2024, pursuant to Local Rule 7-3, counsel for Disney conducted a meet and confer with Plaintiff Gina Carano's counsel via videoconference. During this conference, counsel for Disney explained its grounds for moving for interlocutory appeal under 28 U.S.C. § 1292(b) and stay of proceedings. Counsel for Carano stated they disagreed with Disney's position and would oppose the motion. The parties thus were unable to reach a resolution of the matter.

4. Attached as Exhibit 1 to this declaration is a true and correct copy of Plaintiff Gina Carano's First Interrogatories, Requests for Production of Documents, and Requests for Admission to Defendants, dated July 30, 2024.

5. Attached as Exhibit 2 to this declaration are true and correct copies of Plaintiff Gina Carano's Notices of Intent to Serve Subpoenas to Produce Documents, dated August 5, 2024 and August 20, 2024.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

1 EXECUTED August 23, 2024, in Los Angeles, California.

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3 /s/ Daniel M. Petrocelli  
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